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July 19, 2022

By ECF and email

Hon. Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

7/19/2022
So ordered
Paul A. Crotty
ccw

Re: United States v. Jamal Simon
18 Cr 339 (PAC)

Dear Judge Crotty:

I write to request that the Court extend the motion schedule by 45 days with regard to the defendant's compassionate release motion. I have conferred with AUSA Nicholas Chiuchiolo and the Government consents to this request.

The reason for the request is that I have been having difficulty reaching Mr. Simon and obtaining necessary information.

I respectfully request that the Court revise the motions schedule as follows:

Defense motions by September 1, 2022
Government response by September 22, 2022
Reply, if any, by September 29, 2022

If the foregoing is acceptable to the Court, then I respectfully request that Your Honor "So Order" this letter.

Thank you for your consideration in this matter.

Respectfully,

Daniel S. Parker
Daniel S. Parker

Cc; all parties (By ECF)
AUSA Chiuchiolo (by email)